

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 20-md-02924-ROSENBERG

IN RE: ZANTAC (RANITIDINE) .
PRODUCTS LIABILITY . West Palm Beach, FL
LITIGATION. . May 6, 2021
. .
.

STATUS CONFERENCE (through Zoom)
BEFORE THE HONORABLE BRUCE REINHART
UNITED STATES MAGISTRATE JUDGE

FOR THE PLAINTIFFS: **MICHAEL L. McGLAMRY, ESQ.**
Pope McGlamry P.C.
3391 Peachtree Road NE
Suite 300
Atlanta, GA 30326
404-523-7706

FOR THE DEFENDANTS: **M. ELAINE HORN, ESQ.**
Williams & Connolly
725 12th Street NW
Washington, D.C. 20005
202-434-5567

SARA K. THOMPSON, ESQ.
Greenberg Traurig
3333 Piedmont Road NE
Suite 2500
Atlanta, GA 30305
678-553-2385

TERRY M. HENRY, ESQ.
Blank Rome LLP
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103
215-569-5644

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Official Court Reporter: Pauline A. Stipes
HON. ROBIN L. ROSENBERG
Ft. Pierce/West Palm Beach, Fl
772.467.2337

1 *THE COURT:* Good morning, everyone. This is Case
2 Number 20-2924, In Re: Zantac (Ranitidine) Multi District
3 Litigation. We are here this morning on a matter that was
4 referred by Judge Rosenberg based upon the parties' submissions
5 relating to possible modifications to Pretrial Orders 54 and
6 60.

7 Let me have everyone make an appearance, please. Let
8 me start with counsel for the Plaintiffs, please.

9 *MR. McGLAMRY:* Good morning, your Honor, Mike McGlamry
10 for the Plaintiffs.

11 *THE COURT:* Good morning, Mr. McGlamry. On behalf of
12 the brand Defendants.

13 *MS. HORN:* Good morning, your Honor, Elaine Horn from
14 Williams & Connolly on behalf of the brands.

15 *THE COURT:* Good morning, Ms. Horn. On behalf of the
16 generic Defendants.

17 *MR. HENRY:* Good morning, your Honor, it's Terry
18 Henry, Apotex Corp, on behalf of the generic manufacturers.

19 *MS. THOMPSON:* Good morning, your Honor, Sara Thompson
20 for the Teva Defendants on behalf of the generic manufacturers.

21 *THE COURT:* Good morning, Ms. Thompson.

22 It is my understanding through the special master
23 that we may not be able to proceed with much this morning, or
24 at least from the Defense perspective, because Mr. Sachse, who
25 had been intimately involved in these negotiations, apparently

1 has a health issue, which I am sorry to hear.

2 Ms. Horn, I don't know if you or Ms. Thompson or Mr.
3 Henry, who is the right person that can bring the Court up to
4 speed on where the Defense is on whether we can go forward this
5 morning?

6 *MS. HORN:* Good morning, your Honor, Elaine Horn for
7 the brands. My understanding is that right before Mr. Sachse
8 was taken out, there may have been some preliminary discussions
9 in an attempt to resolve the issues. It is unclear how much
10 more needs to be done on that, but there has not been a
11 resolution. So, if that is still on the table, then we do need
12 more time to get up to speed on that and move that forward.

13 *THE COURT:* Let me turn to Mr. Henry or Ms. Thompson.
14 Ms. Thompson, you have your microphone off first so I will turn
15 to you first.

16 *MS. THOMPSON:* Sara Thompson for the generic
17 Defendants, your Honor. I think we both turned it off because
18 we both have some updates. I can start that. We have made a
19 substantial amount of progress on the core issue, but we also
20 do believe that there would be some benefit to waiting for some
21 of the other negotiations that are underway with respect to the
22 broader schedule.

23 *THE COURT:* Okay. Mr. Henry.

24 *MR. HENRY:* I agree with that analysis, your Honor.

25 *THE COURT:* Let me turn to Mr. McGlamry. Mr.

1 McGlamry, what I was going to do this morning was just let you
2 all make a record, essentially just ask why do you want the
3 changes you want, why do you oppose the changes that they want,
4 let everybody speak their piece, and then Judge Rosenberg and I
5 could look at a more fully developed argument record and decide
6 how to proceed.

7 What is your position on whether we should do that
8 here this morning or whether some additional time might be
9 beneficial in the parties resolving some of these issues?

10 *MR. McGLAMRY:* Thank you, your Honor, Mike McGlamry
11 for the Plaintiffs. First of all, I want to say that we are
12 always happy to accommodate Will, I understand he is going
13 through a tough issue here, and so in that sense, first of all,
14 if, you know, this were just an ask for an extension because of
15 that, we would agree.

16 I also at some level echo what Elaine and Sara and
17 Terry have said about we have had some discussion through the
18 special master about this, we have not resolved it. A couple
19 of days might be helpful, so I do not oppose putting that off a
20 couple of more days, either so that Will can reappear or for us
21 to have an opportunity to do that.

22 My bigger concern is sort of the overall impact of
23 trying to get these issues resolved because, obviously, we want
24 these edits, if you will, at least from our perspective, to
25 help avoid misunderstandings or further delay.

1 But I also just want the Court to know that as it
2 relates to PTO 60, for example, the April depositions we were
3 scheduled to do, more than 70 percent have not gone forward
4 and, you know, half a dozen or more have been rescheduled three
5 or four times. Again, I am not casting aspersions in any way
6 because they are typically document production related, which
7 are what these edits hopefully will help address, but
8 obviously, as soon as it makes sense to get back or to get this
9 resolved, we would like, obviously, for that to happen.

10 *THE COURT:* Thank you. I am going to reset this. It
11 seems to me that giving you some additional time to continue to
12 talk would be productive, and I will certainly accommodate
13 that. In addition, given Mr. Sachse's health and his role in
14 this, I think it is important that he be available to be
15 conferred with.

16 That being said, let me share some thoughts from the
17 Court's perspective. First of all, I recognize that these PTOs
18 were negotiated in the first instance in good faith. When you
19 are looking forward into the future you do the best you can and
20 try to anticipate problems and you try to create structures
21 that will deal with the problems.

22 It seems that some of our -- we got close to the
23 center of the bull's eye, but maybe didn't hit exactly the
24 center of the bull's eye on these, and that there does need to
25 be some tweaking, or at least one or more of the parties

1 believes there needs to be some tweaking, and in good faith
2 wants to have that discussion.

3 As Judge Rosenberg made clear the other day, the Court
4 is happy to entertain that. If the existing structure isn't
5 working, then the Court will entertain modifications to make it
6 work better.

7 I also want to make clear, I know the Court has heard
8 both sides and I do think both sides have legitimate positions
9 here. The Plaintiffs are very concerned about getting
10 documents what they view as very late in the procedure which
11 prevents them from taking meaningful depositions, which is
12 causing them to have to put off certain depositions, so I hear
13 that.

14 I hear from the other side, however, very clearly they
15 are doing a lot. They have produced a lot of documentation in
16 a short period of time, the schedule is compressed and they are
17 doing the best they can. There is certainly no intent to
18 prejudice the Plaintiffs.

19 So, I think there are equities on both sides of those
20 arguments, at least from what I know so far.

21 I also acknowledge, as Judge Rosenberg has said, the
22 elephant in the room hanging over all of this is PTO 30, and
23 the Plaintiffs have been asked to submit a proposal, and
24 understandably, getting these issues resolved is going to help
25 them more accurately predict the deadlines that they are going

1 to ask for in PTO 30 and may help the Defendants more
2 accurately either agree or disagree to the deadlines that the
3 Plaintiffs want to propose in a modified PTO 30. So, that is
4 the Court's perspective, I see that.

5 What I would like to do is this. I would like to give
6 you some time -- I am going to direct you to continue to meet
7 and confer and continue to meet with the special master
8 additionally to try to resolve these issues, but I don't want
9 it to hang on for too long.

10 What I would like to do is set a status maybe
11 Tuesday -- looking at my calendar here -- Tuesday morning at
12 9:30, a very brief 10, 15 minute status call just to bring me
13 up to speed on where you are and whether you think further
14 discussions are going to be fruitful or whether we have now
15 reached the point where the Court has to get involved.

16 If you feel at that point the Court needs to get
17 involved, I will schedule a time Wednesday or maybe Thursday to
18 actually have you come in and do what we were going to do
19 today, hopefully on a more narrow number of issues. That way
20 you have the rest of today, tomorrow, I don't expect you to
21 work this weekend, but if you want to, you can, Monday and into
22 Tuesday, and then I can set a quick check-in with you all
23 Tuesday morning.

24 You can let me know where you are, and if we need to
25 have further proceedings, or if you say to me, look, we are

1 making good progress with the special master, a couple more
2 days would be helpful, that is great.

3 I understand some of the negotiations you are going
4 through are touchy issues. One of the things that I know the
5 Plaintiffs are asking for is more teeth, that if the Defendants
6 are late on producing materials that there ought to be some
7 bite for doing that, and the Defendants are asking for a little
8 more understanding that, look, we are really doing the best we
9 can, we only want to prepare our witnesses once. If we have to
10 keep having repetitive 30(b)(6) depositions or piecemeal
11 depositions it is inefficient.

12 Again, I hear it from both sides that there is a need
13 for an enforcement mechanism, but also maybe a little bit of
14 understanding of their needs. As Judge Rosenberg has said many
15 times, it is always best for you all to negotiate that out
16 because you can best represent your own views and protect
17 yourselves when you are talking to each other. If the Court
18 gets involved, the Court will make the best judgment it can,
19 but you may not get as much as you want from us, you may be
20 able to negotiate a better deal with each other.

21 With that, let me ask -- I have criminal court on
22 Tuesday -- actually, I don't have criminal court on Tuesday.
23 How is Tuesday at either 9:30 or 10:00 o'clock, like I said,
24 for just a quick check-in on the status? Mr. McGlamry, does
25 that work for you on your side?

1 *MR. McGLAMRY:* Yes, your Honor, that is perfect.

2 *THE COURT:* Do you have a preference between 9:30 and
3 10:00?

4 *MR. McGLAMRY:* No, your Honor, either one is fine with
5 me.

6 *THE COURT:* Ms. Horn, any preference?

7 *MS. HORN:* No preference.

8 *THE COURT:* Mr. Henry?

9 *MR. HENRY:* Those times work for me, your Honor. No
10 preference.

11 *THE COURT:* Ms. Thompson?

12 *MS. THOMPSON:* Thank you, your Honor, same for me,
13 they work.

14 *THE COURT:* Here is what I am going to do. Out of
15 deference to folks like Ms. Johnston and Mr. Yoo who have to
16 phone in from the west coast, I'll do it at 10:00 so they can
17 get an extra half hour of work in. I would say sleep, but I
18 know them better than that. They can get an extra half hour of
19 billable time in before we have the hearing.

20 We'll set a status hearing at 10:00 o'clock on Tuesday
21 morning, you can give me a quick check-in. I am not going to
22 rule on anything, I am not going to expect any argument. It
23 literally is just going to be we are making progress, or we
24 have reached a point where we can't make more progress, and
25 then we will see where we are at that point.

1 With that, Mr. McGlamry, anything else you think we
2 can try to accomplish here this morning?

3 *MR. McGLAMRY:* No, your Honor, I think that's great.
4 I appreciate your working with us on this and accommodating
5 Will, and hopefully we will be able to resolve this.

6 *THE COURT:* I hope so. Ms. Horn, anything else this
7 morning we can take up?

8 *MS. HORN:* No, your Honor.

9 *THE COURT:* Mr. Henry?

10 *MR. HENRY:* No, your Honor. I appreciate your time
11 and the opportunity to work with the special master. Thank
12 you.

13 *THE COURT:* Ms. Thompson, anything else?

14 *MS. THOMPSON:* No, your Honor. Thank you very much
15 for your time.

16 *THE COURT:* I said this very briefly off the record, I
17 will say it again on the record. I just want to congratulate
18 the McGlamry family, I understand there is a healthy bouncing
19 baby boy, grandson, who has a wonderful first name. Mr.
20 McGlamry, please pass on the Court's best wishes to your
21 daughter, her husband, and your entire family.

22 *MR. McGLAMRY:* Thank you, your Honor. It's been
23 great, it's been exciting, and I appreciate the Court's
24 interest in that. Thank you.

25 *THE COURT:* And I ask all of you to please pass along

1 to Mr. Sachse the Court's best wishes. I hope he is feeling
2 better.

3 Okay, we will be in recess. I will see you all on
4 Tuesday morning at 10:00 o'clock.

5 MR. McGLAMRY: Thank you, your Honor.

6 THE COURT: Thank you. Have a good day.

7 *(Thereupon, the hearing was concluded.)*

8 * * *

9 I certify that the foregoing is a correct transcript
10 from the record of proceedings in the above matter.

11
12 Date: May 6, 2021

13 /s/ Pauline A. Stipes, Official Federal Reporter

14 Signature of Court Reporter
15
16
17
18
19
20
21
22
23
24
25

Pauline A. Stipes, Official Federal Reporter

<p>MR. HENRY: [4] 3/16 4/23 10/8 11/9</p> <p>MR. McGLAMRY: [7] 3/8 5/9 9/25 10/3 11/2 11/21 12/4</p> <p>MS. HORN: [4] 3/12 4/5 10/6 11/7</p> <p>MS. THOMPSON: [4] 3/18 4/15 10/11 11/13</p> <p>THE COURT: [19]</p>	<p>about [3] 5/17 5/18 7/9</p> <p>above [1] 12/10</p> <p>accommodate [2] 5/12 6/12</p> <p>accommodating [1] 11/4</p> <p>accomplish [1] 11/2</p> <p>accurately [2] 7/25 8/2</p> <p>acknowledge [1] 7/21</p> <p>actually [2] 8/18 9/22</p> <p>addition [1] 6/13</p> <p>additional [2] 5/8 6/11</p> <p>additionally [1] 8/8</p> <p>address [1] 6/7</p> <p>again [3] 6/5 9/12 11/17</p> <p>agree [3] 4/24 5/15 8/2</p> <p>all [9] 5/2 5/11 5/13 6/17 7/22 8/22 9/15 11/25 12/3</p> <p>along [1] 11/25</p> <p>also [6] 4/19 5/16 6/1 7/7 7/21 9/13</p> <p>always [2] 5/12 9/15</p> <p>am [7] 4/1 6/5 6/10 8/6 10/14 10/21 10/22</p> <p>amount [1] 4/19</p> <p>analysis [1] 4/24</p> <p>anticipate [1] 6/20</p> <p>any [3] 6/5 10/6 10/22</p> <p>anything [4] 10/22 11/1 11/6 11/13</p> <p>Apotex [1] 3/18</p> <p>apparently [1] 3/25</p> <p>appearance [1] 3/7</p> <p>appreciate [3] 11/4 11/10 11/23</p> <p>April [1] 6/2</p> <p>are [24]</p> <p>argument [2] 5/5 10/22</p> <p>arguments [1] 7/20</p> <p>as [9] 6/1 6/8 6/8 7/3 7/10 7/21 9/14 9/19 9/19</p> <p>ask [5] 5/2 5/14 8/1 9/21 11/25</p> <p>asked [1] 7/23</p> <p>asking [2] 9/5 9/7</p> <p>aspersions [1] 6/5</p> <p>Atlanta [2] 1/13 1/20</p> <p>attempt [1] 4/9</p> <p>available [1] 6/14</p> <p>avoid [1] 5/25</p>	<p>best [8] 6/19 7/17 9/8 9/15 9/16 9/18 11/20 12/1</p> <p>better [4] 7/6 9/20 10/18 12/2</p> <p>between [1] 10/2</p> <p>bigger [1] 5/22</p> <p>billable [1] 10/19</p> <p>bit [1] 9/13</p> <p>bite [1] 9/7</p> <p>Blank [1] 1/22</p> <p>both [6] 4/17 4/18 7/8 7/8 7/19 9/12</p> <p>bouncing [1] 11/18</p> <p>boy [1] 11/19</p> <p>brand [1] 3/12</p> <p>brands [2] 3/14 4/7</p> <p>brief [1] 8/12</p> <p>briefly [1] 11/16</p> <p>bring [2] 4/3 8/12</p> <p>broader [1] 4/22</p> <p>BRUCE [1] 1/9</p> <p>bull's [2] 6/23 6/24</p>
/		
/s [1] 12/13		
1		
10 [1] 8/12		
10:00 [2] 10/3 10/16		
10:00 o'clock [3] 9/23 10/20 12/4		
12th [1] 1/16		
130 [1] 1/23		
15 [1] 8/12		
18th [1] 1/23		
19103 [1] 1/23		
2		
20-2924 [1] 3/2		
20-md-02924-ROSENBERG [1] 1/3		
20005 [1] 1/16		
202-434-5567 [1] 1/17		
2021 [2] 1/5 12/12		
215-569-5644 [1] 1/24		
2385 [1] 1/20		
2500 [1] 1/19		
2924 [1] 3/2		
3		
30 [4] 7/22 8/1 8/3 9/10		
300 [1] 1/13		
30305 [1] 1/20		
30326 [1] 1/13		
3333 [1] 1/19		
3391 [1] 1/12		
4		
404-523-7706 [1] 1/14		
5		
54 [1] 3/5		
5567 [1] 1/17		
5644 [1] 1/24		
6		
60 [2] 3/6 6/2		
678-553-2385 [1] 1/20		
7		
70 percent [1] 6/3		
725 [1] 1/16		
7706 [1] 1/14		
772.467.2337 [1] 2/2		
9		
9:30 [3] 8/12 9/23 10/2		
A		
able [3] 3/23 9/20 11/5		
	<p>baby [1] 11/19</p> <p>back [1] 6/8</p> <p>based [1] 3/4</p> <p>be [17]</p> <p>be some [1] 7/1</p> <p>BEACH [3] 1/2 1/5 2/2</p> <p>because [6] 3/24 4/17 5/14 5/23 6/6 9/16</p> <p>been [7] 3/25 4/8 4/10 6/4 7/23 11/22 11/23</p> <p>before [3] 1/9 4/7 10/19</p> <p>behalf [5] 3/11 3/14 3/15 3/18 3/20</p> <p>being [1] 6/16</p> <p>believe [1] 4/20</p> <p>believes [1] 7/1</p> <p>beneficial [1] 5/9</p> <p>benefit [1] 4/20</p>	<p>C</p> <p>calendar [1] 8/11</p> <p>call [1] 8/12</p> <p>can [17]</p> <p>can't [1] 10/24</p> <p>CASE [2] 1/3 3/1</p> <p>casting [1] 6/5</p> <p>causing [1] 7/12</p> <p>center [2] 6/23 6/24</p> <p>certain [1] 7/12</p> <p>certainly [2] 6/12 7/17</p> <p>certify [1] 12/9</p> <p>changes [2] 5/3 5/3</p> <p>check [3] 8/22 9/24 10/21</p> <p>check-in [3] 8/22 9/24 10/21</p> <p>clear [2] 7/3 7/7</p> <p>clearly [1] 7/14</p> <p>close [1] 6/22</p> <p>coast [1] 10/16</p> <p>come [1] 8/18</p> <p>compressed [1] 7/16</p> <p>concern [1] 5/22</p> <p>concerned [1] 7/9</p> <p>concluded [1] 12/7</p> <p>confer [1] 8/7</p> <p>CONFERENCE [1] 1/9</p> <p>conferred [1] 6/15</p> <p>congratulate [1] 11/17</p> <p>Connolly [2] 1/15 3/14</p> <p>continue [3] 6/11 8/6 8/7</p> <p>core [1] 4/19</p> <p>Corp [1] 3/18</p> <p>correct [1] 12/9</p> <p>could [1] 5/5</p> <p>counsel [1] 3/8</p> <p>couple [3] 5/18 5/20 9/1</p> <p>court [14]</p> <p>Court's [5] 6/17 8/4 11/20 11/23 12/1</p> <p>create [1] 6/20</p> <p>criminal [2] 9/21 9/22</p>
		<p>D</p> <p>D.C [1] 1/16</p> <p>Date [1] 12/12</p>

<p>D</p> <p>daughter [1] 11/21 day [2] 7/3 12/6 days [3] 5/19 5/20 9/2 deadlines [2] 7/25 8/2 deal [2] 6/21 9/20 decide [1] 5/5 DEFENDANTS [8] 1/15 3/12 3/16 3/20 4/17 8/1 9/5 9/7 Defense [2] 3/24 4/4 deference [1] 10/15 delay [1] 5/25 depositions [5] 6/2 7/11 7/12 9/10 9/11 depositions it [1] 9/11 developed [1] 5/5 didn't [1] 6/23 direct [1] 8/6 disagree [1] 8/2 discussion [2] 5/17 7/2 discussions [2] 4/8 8/14 DISTRICT [3] 1/1 1/1 3/2 DIVISION [1] 1/2 do [18] document [1] 6/6 documentation [1] 7/15 documents [1] 7/10 does [2] 6/24 9/24 doing [4] 7/15 7/17 9/7 9/8 don't [4] 4/2 8/8 8/20 9/22 done [1] 4/10 dozen [1] 6/4</p>	<p>fine [1] 10/4 first [7] 4/14 4/15 5/11 5/13 6/17 6/18 11/19 FL [2] 1/5 2/2 FLORIDA [1] 1/1 folks [1] 10/15 folks like [1] 10/15 foregoing [1] 12/9 forward [4] 4/4 4/12 6/3 6/19 four [1] 6/5 fruitful [1] 8/14 Ft [1] 2/2 fully [1] 5/5 fully developed [1] 5/5 further [3] 5/25 8/13 8/25 future [1] 6/19</p>	<p>hopefully [3] 6/7 8/19 11/5 HORN [7] 1/15 3/13 3/15 4/2 4/6 10/6 11/6 hour [2] 10/17 10/18 how [3] 4/9 5/6 9/23 however [1] 7/14 husband [1] 11/21</p>
<p>E</p> <p>each [2] 9/17 9/20 echo [1] 5/16 edits [2] 5/24 6/7 either [4] 5/20 8/2 9/23 10/4 ELAINE [4] 1/15 3/13 4/6 5/16 elephant [1] 7/22 else [3] 11/1 11/6 11/13 enforcement [1] 9/13 entertain [2] 7/4 7/5 entire [1] 11/21 equities [1] 7/19 ESQ [4] 1/11 1/15 1/18 1/21 essentially [1] 5/2 everybody [1] 5/4 everyone [2] 3/1 3/7 exactly [1] 6/23 example [1] 6/2 exciting [1] 11/23 existing [1] 7/4 expect [2] 8/20 10/22 extension [1] 5/14 extra [2] 10/17 10/18 eye [2] 6/23 6/24</p>	<p>G</p> <p>GA [2] 1/13 1/20 generic [4] 3/16 3/18 3/20 4/16 get [9] 4/12 5/23 6/8 6/8 8/15 8/16 9/19 10/17 10/18 gets [1] 9/18 getting [2] 7/9 7/24 give [2] 8/5 10/21 given [1] 6/13 giving [1] 6/11 go [1] 4/4 going [13] gone [1] 6/3 good [13] got [1] 6/22 grandson [1] 11/19 great [3] 9/2 11/3 11/23 Greenberg [1] 1/18</p>	<p>I</p> <p>I'll [1] 10/16 impact [1] 5/22 important [1] 6/14 inefficient [1] 9/11 instance [1] 6/18 intent [1] 7/17 interest [1] 11/24 intimately [1] 3/25 involved [4] 3/25 8/15 8/17 9/18 is [33] isn't [1] 7/4 issue [3] 4/1 4/19 5/13 issues [7] 4/9 5/9 5/23 7/24 8/8 8/19 9/4 it [18] it's [3] 3/17 11/22 11/23</p>
<p>F</p> <p>faith [2] 6/18 7/1 family [2] 11/18 11/21 far [1] 7/20 Federal [1] 12/13 feel [1] 8/16 feeling [1] 12/1</p>	<p>H</p> <p>had [2] 3/25 5/17 half [3] 6/4 10/17 10/18 hang [1] 8/9 hanging [1] 7/22 happen [1] 6/9 happy [2] 5/12 7/4 has [7] 4/1 4/10 7/7 7/21 8/15 9/14 11/19 have [28] having [1] 9/10 he [3] 5/12 6/14 12/1 health [2] 4/1 6/13 healthy [1] 11/18 hear [4] 4/1 7/12 7/14 9/12 heard [1] 7/7 hearing [3] 10/19 10/20 12/7 help [4] 5/25 6/7 7/24 8/1 helpful [2] 5/19 9/2 HENRY [7] 1/21 3/18 4/3 4/13 4/23 10/8 11/9 her [1] 11/21 here [7] 3/3 5/8 5/13 7/9 8/11 10/14 11/2 his [1] 6/13 hit [1] 6/23 HON [1] 2/1 Honor [18] HONORABLE [1] 1/9 hope [2] 11/6 12/1</p>	<p>J</p> <p>Johnston [1] 10/15 JUDGE [6] 1/10 3/4 5/4 7/3 7/21 9/14 judgment [1] 9/18 just [8] 5/1 5/2 5/14 6/1 8/12 9/24 10/23 11/17</p> <p>K</p> <p>keep [1] 9/10 know [9] 4/2 5/14 6/1 6/4 7/7 7/20 8/24 9/4 10/18</p> <p>L</p> <p>late [2] 7/10 9/6 least [4] 3/24 5/24 6/25 7/20 legitimate [1] 7/8 let [9] 3/7 3/7 4/13 4/25 5/1 5/4 6/16 8/24 9/21 level [1] 5/16 LIABILITY [1] 1/5 like [6] 6/9 8/5 8/5 8/10 9/23 10/15 literally [1] 10/23 LITIGATION [2] 1/5 3/3 little [2] 9/7 9/13 LLP [1] 1/22 Logan [1] 1/22 long [1] 8/9 look [3] 5/5 8/25 9/8 looking [2] 6/19 8/11 lot [2] 7/15 7/15</p> <p>M</p> <p>made [2] 4/18 7/3 MAGISTRATE [1] 1/10 make [6] 3/7 5/2 7/5 7/7 9/18 10/24 makes [1] 6/8 making [2] 9/1 10/23</p>

<p>M</p> <p>manufacturers [2] 3/18 3/20 many [1] 9/14 master [5] 3/22 5/18 8/7 9/11/11 materials [1] 9/6 matter [2] 3/3 12/10 may [7] 1/5 3/23 4/8 8/1 9/19 9/19 12/12 maybe [4] 6/23 8/10 8/17 9/13 McGLAMRY [11] 1/11 1/12 3/9 3/11 4/25 5/1 5/10 9/24 11/11/18 11/20 md [1] 1/3 me [14] meaningful [1] 7/11 mechanism [1] 9/13 meet [2] 8/6 8/7 MICHAEL [1] 1/11 microphone [1] 4/14 might [2] 5/8 5/19 Mike [2] 3/9 5/10 minute [1] 8/12 misunderstandings [1] 5/25 modifications [2] 3/5 7/5 modified [1] 8/3 Monday [1] 8/21 more [14] morning [20] move [1] 4/12 Mr [16] Ms [9] 3/15 3/21 4/2 4/2 4/13 4/14 10/11 10/15 11/13 Ms. [2] 10/6 11/6 Ms. Horn [2] 10/6 11/6 much [4] 3/23 4/9 9/19 11/14 Multi [1] 3/2 my [4] 3/22 4/7 5/22 8/11</p>	<p>one [4] 1/22 6/25 9/4 10/4 only [1] 9/9 opportunity [2] 5/21 11/11 oppose [2] 5/3 5/19 Orders [1] 3/5 other [5] 4/21 7/3 7/14 9/17 9/20 ought [1] 9/6 our [3] 5/24 6/22 9/9 out [3] 4/8 9/15 10/14 over [1] 7/22 overall [1] 5/22 own [1] 9/16</p>	<p>protect [1] 9/16 PTO [4] 6/2 7/22 8/1 8/3 PTOs [1] 6/17 put [1] 7/12 putting [1] 5/19</p>
<p>N</p> <p>name [1] 11/19 narrow [1] 8/19 NE [2] 1/12 1/19 need [4] 4/11 6/24 8/24 9/12 needs [4] 4/10 7/1 8/16 9/14 negotiate [2] 9/15 9/20 negotiated [1] 6/18 negotiations [3] 3/25 4/21 9/3 no [9] 1/3 7/17 10/4 10/7 10/9 11/3 11/8 11/10 11/14 not [9] 3/23 4/10 5/18 5/19 6/3 6/5 9/19 10/21 10/22 now [1] 8/14 number [2] 3/2 8/19 NW [1] 1/16</p>	<p>P</p> <p>P.C [1] 1/12 PA [1] 1/23 PALM [3] 1/2 1/5 2/2 parties [2] 5/9 6/25 parties' [1] 3/4 pass [2] 11/20 11/25 Pauline [2] 2/1 12/13 Peachtree [1] 1/12 percent [1] 6/3 perfect [1] 10/1 period [1] 7/16 person [1] 4/3 perspective [4] 3/24 5/24 6/17 8/4 Philadelphia [1] 1/23 phone [1] 10/16 piece [1] 5/4 piecemeal [1] 9/10 Piedmont [1] 1/19 Pierce [1] 2/2 Pierce/West [1] 2/2 PLAINTIFFS [9] 1/11 3/8 3/10 5/11 7/9 7/18 7/23 8/3 9/5 please [4] 3/7 3/8 11/20 11/25 point [4] 8/15 8/16 10/24 10/25 Pope [1] 1/12 position [1] 5/7 positions [1] 7/8 possible [1] 3/5 predict [1] 7/25 predict the [1] 7/25 preference [4] 10/2 10/6 10/7 10/10 prejudice [1] 7/18 preliminary [1] 4/8 prepare [1] 9/9 Pretrial [1] 3/5 prevents [1] 7/11 problems [2] 6/20 6/21 procedure [1] 7/10 proceed [2] 3/23 5/6 proceedings [2] 8/25 12/10 produced [1] 7/15 producing [1] 9/6 production [1] 6/6 productive [1] 6/12 PRODUCTS [1] 1/5 progress [4] 4/19 9/1 10/23 10/24 proposal [1] 7/23 propose [1] 8/3</p>	<p>Q</p> <p>quick [3] 8/22 9/24 10/21</p> <p>R</p> <p>RANITIDINE [2] 1/4 3/2 RE [2] 1/4 3/2 reached [2] 8/15 10/24 really [1] 9/8 reappear [1] 5/20 recess [1] 12/3 recognize [1] 6/17 record [5] 5/2 5/5 11/16 11/17 12/10 referred [1] 3/4 REINHART [1] 1/9 related [1] 6/6 relates [1] 6/2 relating [1] 3/5 repetitive [1] 9/10 Reporter [3] 2/1 12/13 12/14 represent [1] 9/16 rescheduled [1] 6/4 reset [1] 6/10 resolution [1] 4/11 resolve [3] 4/9 8/8 11/5 resolved [4] 5/18 5/23 6/9 7/24 resolving [1] 5/9 respect [1] 4/21 rest [1] 8/20 right [2] 4/3 4/7 Road [2] 1/12 1/19 ROBIN [1] 2/1 role [1] 6/13 Rome [1] 1/22 room [1] 7/22 ROSENBERG [7] 1/3 2/1 3/4 5/4 7/3 7/21 9/14 rule [1] 10/22</p>
<p>O</p> <p>o'clock [3] 9/23 10/20 12/4 obviously [3] 5/23 6/8 6/9 of the [1] 3/20 off [5] 4/14 4/17 5/19 7/12 11/16 Official [2] 2/1 12/13 Okay [2] 4/23 12/3 once [1] 9/9</p>	<p>S</p> <p>Sachse [3] 3/24 4/7 12/1 Sachse's [1] 6/13 said [6] 5/17 6/16 7/21 9/14 9/23 11/16 same [1] 10/12 SARA [4] 1/18 3/19 4/16 5/16 say [4] 5/11 8/25 10/17 11/17 schedule [3] 4/22 7/16 8/17 scheduled [1] 6/3 see [3] 8/4 10/25 12/3 seems [2] 6/11 6/22 sense [2] 5/13 6/8 set [3] 8/10 8/22 10/20 share [1] 6/16 short [1] 7/16 should [1] 5/7 side [2] 7/14 9/25 sides [4] 7/8 7/8 7/19 9/12 Signature [1] 12/14 sleep [1] 10/17</p>	

<p>S</p> <p>so [11] 4/11 4/14 5/13 5/19 5/20 7/12 7/19 7/20 8/3 10/16 11/6</p> <p>some [16]</p> <p>soon [1] 6/8</p> <p>sorry [1] 4/1</p> <p>sort [1] 5/22</p> <p>SOUTHERN [1] 1/1</p> <p>speak [1] 5/4</p> <p>special [5] 3/22 5/18 8/7 9/1 11/11</p> <p>speed [3] 4/4 4/12 8/13</p> <p>Square [1] 1/22</p> <p>start [2] 3/8 4/18</p> <p>STATES [2] 1/1 1/10</p> <p>status [5] 1/9 8/10 8/12 9/24 10/20</p> <p>still [1] 4/11</p> <p>Stripes [2] 2/1 12/13</p> <p>Street [2] 1/16 1/23</p> <p>structure [1] 7/4</p> <p>structures [1] 6/20</p> <p>submissions [1] 3/4</p> <p>submit [1] 7/23</p> <p>substantial [1] 4/19</p> <p>Suite [2] 1/13 1/19</p>	<p>those [2] 7/19 10/9</p> <p>thoughts [1] 6/16</p> <p>three [1] 6/4</p> <p>through [5] 1/9 3/22 5/13 5/17 9/4</p> <p>Thursday [1] 8/17</p> <p>time [9] 4/12 5/8 6/11 7/16 8/6 8/17 10/19 11/10 11/15</p> <p>times [3] 6/5 9/15 10/9</p> <p>today [2] 8/19 8/20</p> <p>tomorrow [1] 8/20</p> <p>too [1] 8/9</p> <p>touchy [1] 9/4</p> <p>tough [1] 5/13</p> <p>transcript [1] 12/9</p> <p>Traurig [1] 1/18</p> <p>try [4] 6/20 6/20 8/8 11/2</p> <p>trying [1] 5/23</p> <p>Tuesday [9] 8/11 8/11 8/22 8/23 9/22 9/22 9/23 10/20 12/4</p> <p>turn [3] 4/13 4/14 4/25</p> <p>turned [1] 4/17</p> <p>tweaking [2] 6/25 7/1</p> <p>typically [1] 6/6</p>	<p>which [4] 4/1 6/6 7/10 7/11</p> <p>who [4] 3/24 4/3 10/15 11/19</p> <p>why [2] 5/2 5/3</p> <p>will [16]</p> <p>Williams [2] 1/15 3/14</p> <p>wishes [2] 11/20 12/1</p> <p>witnesses [1] 9/9</p> <p>wonderful [1] 11/19</p> <p>work [7] 7/6 8/21 9/25 10/9 10/13 10/17 11/11</p> <p>working [2] 7/5 11/4</p> <p>would [9] 4/20 5/15 6/9 6/12 8/5 8/5 8/10 9/2 10/17</p>
<p>T</p> <p>table [1] 4/11</p> <p>take [1] 11/7</p> <p>taken [1] 4/8</p> <p>taking [1] 7/11</p> <p>talk [1] 6/12</p> <p>talking [1] 9/17</p> <p>teeth [1] 9/5</p> <p>TERRY [3] 1/21 3/17 5/17</p> <p>Teva [1] 3/20</p> <p>than [2] 6/3 10/18</p> <p>Thank [9] 5/10 6/10 10/12 11/11 11/14 11/22 11/24 12/5 12/6</p> <p>that [55]</p> <p>that we [1] 3/23</p> <p>that's [1] 11/3</p> <p>the Teva [1] 3/20</p> <p>their [2] 5/4 9/14</p> <p>them [4] 7/11 7/12 7/25 10/18</p> <p>then [5] 4/11 5/4 7/5 8/22 10/25</p> <p>there [10] 4/8 4/10 4/20 6/24 7/1 7/17 7/19 9/6 9/12 11/18</p> <p>Thereupon [1] 12/7</p> <p>these [9] 3/25 5/9 5/23 5/24 6/7 6/17 6/24 7/24 8/8</p> <p>they [11] 5/3 6/6 7/10 7/14 7/15 7/16 7/17 7/25 10/13 10/16 10/18</p> <p>things [1] 9/4</p> <p>think [7] 4/17 6/14 7/8 7/19 8/13 11/1 11/3</p> <p>this [19]</p> <p>THOMPSON [9] 1/18 3/19 3/21 4/2 4/13 4/14 4/16 10/11 11/13</p>	<p>U</p> <p>unclear [1] 4/9</p> <p>understand [3] 5/12 9/3 11/18</p> <p>understandably [1] 7/24</p> <p>understanding [4] 3/22 4/7 9/8 9/14</p> <p>underway [1] 4/21</p> <p>UNITED [2] 1/1 1/10</p> <p>up [4] 4/3 4/12 8/13 11/7</p> <p>updates [1] 4/18</p> <p>upon [1] 3/4</p> <p>us [3] 5/20 9/19 11/4</p>	<p>Y</p> <p>Yes [1] 10/1</p> <p>Yoo [1] 10/15</p> <p>you [51]</p> <p>your [27]</p> <p>yourselves [1] 9/17</p>
	<p>V</p> <p>very [6] 7/9 7/10 7/14 8/12 11/14 11/16</p> <p>view [1] 7/10</p> <p>views [1] 9/16</p>	<p>Z</p> <p>ZANTAC [2] 1/4 3/2</p> <p>Zoom [1] 1/9</p>
	<p>W</p> <p>waiting [1] 4/20</p> <p>want [13]</p> <p>wants [1] 7/2</p> <p>was [5] 3/3 4/8 5/1 5/1 12/7</p> <p>Washington [1] 1/16</p> <p>way [2] 6/5 8/19</p> <p>we [35]</p> <p>We'll [1] 10/20</p> <p>Wednesday [1] 8/17</p> <p>weekend [1] 8/21</p> <p>were [4] 5/14 6/2 6/18 8/18</p> <p>were negotiated [1] 6/18</p> <p>west [4] 1/2 1/5 2/2 10/16</p> <p>what [10] 5/1 5/7 5/16 6/7 7/10 7/20 8/5 8/10 8/18 10/14</p> <p>when [2] 6/18 9/17</p> <p>where [6] 4/4 8/13 8/15 8/24 10/24 10/25</p> <p>whether [5] 4/4 5/7 5/8 8/13 8/14</p>	